

EXHIBIT 3

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO**

MELODY JOY CANTU AND DR. RODRIGO
CANTU,

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

5:20-CV-0746 JKP – HJB

**Plaintiff Melody Joy Cantu's
Objections and Responses to
Dr. Guerra's Second Request
for Production of Documents.**

To: **Dr. Sandra Guerra**, by and through her counsel of record Ricardo G. Cedillo, Email: rcedillo@lawdcm.com and Brandy Peery, Email: bpeery@lawdcm.com, DAVIS, CEDILLO & MENDOZA, INC. 755 E. Mulberry, Suite 250, San Antonio, Texas 78212.

Plaintiff MELODY JOY CANTU and serves these Objections and Responses to Dr. Guerra's Second Request for Production of Documents, attached, and incorporated herein as if fully copied and set forth at length.

Dated: July 25, 2022

Stipulated and respectfully submitted,

/s/ Tor Ekeland

Tor Ekeland (NY Bar No. 4493631)
Pro Hac Vice
Tor Ekeland Law, PLLC
30 Wall Street, 8th Floor
New York, NY
t: (718) 737 - 7264
f: (718) 504 - 5417
tor@torekeland.com

and

/s/ Rain Levy Minns

Rain Minns
State Bar No. 24034581
Minns Law Firm, P.C.
d/b/a Rain Minns Law Firm
4412 Spicewood Springs Rd., Suite 500
Austin, Texas 78759-8583
Tel.: 512-372-3222
Fax: 512-861-2403
rain@rainminnslaw.com

*Counsel for Plaintiffs Melody Joy Cantu
and Dr. Rodrigo Cantu*

Certificate of Service

I certify that on this 25th of July 2022, a true and correct copy of the foregoing was served to all counsel of record for the parties in accordance with the Federal Rules of Civil Procedure.

/s/ Tor Ekeland

**Plaintiff Melody Joy Cantu's Objections and Responses to Dr. Guerra's
Second Request for Production of Documents.**

General Objections

1. Plaintiff objects to the Requests to the extent that they seek information that is protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or any other recognized privilege.
2. Plaintiff objects to the Requests to the extent that they require Plaintiff to search for and produce documents or information that are not within its possession, custody, or control.
3. Plaintiff objects to the Requests to the extent they seek information or documents that cannot be located by Plaintiff after reasonable diligent inquiry, are readily available from public sources, or are available to Defendant's Counsel from another source or by other means that are more convenient, more appropriate, less burdensome, or less expensive.
4. Plaintiff objects to the Requests to the extent they seek or rely on legal conclusions or interpretations and/or would require Plaintiff to reach a legal conclusion in order to prepare a response.
5. Plaintiff objects to the Requests to the extent they are argumentative, prejudicial, improper, incorrect, vague, and/or ambiguous.
6. By providing these responses, Plaintiff does not waive any rights to timing of responses to these Requests for Production or other discovery requests or pleading rights it has under the Rules, including service.

Request For Production No. 18:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Plaintiff, Dr. Rodrigo Cantu, during the time period commencing on June 17, 2016 and ending on the date you remarried Plaintiff, Dr. Rodrigo Cantu, which pertain to or concern Defendant, Dr. Sandra Guerra.

Response: see Plaintiff Melody Joy Cantu's First Production; Plaintiff will supplement if additional information presents itself.

Request For Production No. 19:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Plaintiff, Dr. Rodrigo Cantu, during the time period commencing on June 17, 2016 and ending on the date you remarried Plaintiff, Dr. Rodrigo Cantu, which pertain to or concern Defendant, Dr. Sandra Guerra.

Response: This is a repeat question, see above response.

Request For Production No. 20:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Danielle Wollervweron regarding any matter that is the subject of this lawsuit.

Objections: Seeks information and materials constituting Plaintiff's private and/or confidential information and is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Response: Subject to and without waiving the foregoing objection, see Plaintiff Melody Joy Cantu's Second Production; Plaintiff will supplement if additional information presents itself.

Request For Production No. 21:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Rene Charles regarding any matter that is the subject of this lawsuit.

Objection: Rene Charles is no longer a potential witness in this matter.

Request For Production No. 22:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Dottie Laster regarding any matter that is the subject of this lawsuit.

Objections: Seeks information and materials constituting Plaintiff's private and/or confidential information and is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Response: Subject to and without waiving the foregoing objection, see Plaintiff Melody Joy Cantu's Second Production; Plaintiff will supplement if additional information presents itself.

Request For Production No. 23:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Kristina Prewit regarding any matter that is the subject of this lawsuit.

Objection: Kristina Prewit is no longer a potential witness in this matter.

Response: See Plaintiff Dr. Rodrigo Cantu first production.

Request For Production No. 24:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Sheri Makowski regarding any matter that is the subject of this lawsuit.

Objection: Sheri Makowski is no longer a potential witness in this matter.

Response: See Plaintiff Dr. Rodrigo Cantu first production.

Request For Production No. 25:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Jackie Johnston regarding any matter that is the subject of this lawsuit.

Objections: Seeks information and materials constituting Plaintiff's private and/or confidential information and is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Response: Subject to and without waiving the foregoing objection, see Plaintiff Melody Joy Cantu's Second Production; Plaintiff will supplement if additional information presents itself.

Request For Production No. 26:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Daniel Hammerschmidt regarding any matter that is the subject of this lawsuit.

Objection: Daniel Hammerschmidt is no longer a potential witness in this matter.

Request For Production No. 27:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Sameer Kinra regarding any matter that is the subject of this lawsuit.

Objection: Sameer Kinra is no longer a potential witness in this matter.

Request For Production No.28:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Janet Betts regarding any matter that is the subject of this lawsuit.

Objection: Janet Betts is no longer a potential witness in this matter.

Request For Production No. 29:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Lorena M. Hernandez regarding any matter that is the subject of this lawsuit.

Objection: Lorena M. Hernandez is no longer a potential witness in this matter.

Request For Production No. 30:

All communications (including, without limitation, emails, text messages, Facebook messenger, and all other social media platforms) between You and Keira Schwartz Dux regarding any matter that is the subject of this lawsuit.

Objection: Keira Schwartz Dux is no longer a potential witness in this matter.